



Public Works Department
City of Apache Junction
Home of the Superstition Mountains

May 31, 2014

Chris Henninger
Environmental Program Supervisor
Arizona Department of Environmental Quality
1110 W. Washington St.
Phoenix, AZ 85007

Re: Response to MS4 Audit Report (March 2014); Permit No. AZG2002-002

Dear Mr. Henninger:

In March the City of Apache Junction received ADEQ's MS4 Compliance Audit report for the city. We welcome the report as a tool to identify areas for improvement. In the report ADEQ audit staff identified some program deficiencies. The program deficiencies are listed below, followed by a response:

1. *The City's Storm Water Management Program (SWMP) does not accurately reflect current program components.*

City staff is aware of conflicting program components, and seeks ADEQ assistance in correcting these, in light of the upcoming permit renewal.

2. *The City has not developed written procedures for identifying, locating, or eliminating illicit discharges.*

City staff respectfully asks ADEQ for assistance in developing written procedures for the above.

3. *The City's IDDE program has not identified the location of all outfalls from the storm sewer system.*

Early in 2013 the city started collecting GIS field data for storm water structures throughout the city. The intent was to create a database of structures that the city actively maintains to monitor the structures. The next step is to conduct a similar collection to identify and locate outfalls, which the city would likewise use to monitor and inspect outfalls. City staff asks ADEQ to assist in the identification of outfalls meeting ADEQ criteria.

4. *The City has not implemented an outfall inspection program.*

In conjunction with number 3 above, the city asks for ADEQ assistance in creating an outfall inspection program.

5. *The City does not have a system in place to record illicit discharge incident information.*
6. *The City has not developed policies and procedures to review site plans for construction activities.*
7. *The City has not adequately developed and implemented procedures for site inspections and enforcement of BMP control measures at construction sites.*


The city has the desire to comply with the above, but lacks the staff, knowledge, and resources to bring it about. Again, the city asks for ADEQ assistance in preparing the above.

8. *Improper pollution prevention practices were noted during site visits at municipal facilities.*
9. *The City has not conducted pollution prevention/good housekeeping training for municipal employees.*

The city has regular training for employees on a variety of items, and is willing to include and provide training for municipal employees relating to pollution prevention and good housekeeping at municipal facilities. Any training resources that ADEQ has prepared and are available the city will willingly accept and use.

The City of Apache Junction is a small community with extremely limited resources and staff. Regardless, the City of Apache Junction is available and willing to meet with ADEQ staff at ADEQ offices to go over these program issues, and receive guidance from ADEQ as the city moves forward in correcting and implementing the items mentioned in the Audit Report. I can be contacted directly at 480-474-8515 or via email at eschmid@ajcity.net to arrange for these meetings.

Sincerely,



Emile Schmid, P.E.
City Engineer